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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:13-mj-652-VCF
)	
Plaintiff,)	STIPULATION TO CONTINUE
)	PRELIMINARY HEARING
vs.)	(First Request)
)	
JOHN DOE, a.k.a. Arnold Malone,)	
)	
Defendant.)	
)	

IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden, United States Attorney, and Sarah E. Griswold, Assistant United States Attorney, counsel for the United States of America, and Raquel Lazo, Assistant Federal Public Defender, counsel for Defendant John Doe, a.k.a. Arnold Malone, that the Preliminary Hearing in this matter currently scheduled for May 4, 2015, at the hour of 4:00 p.m., be vacated and set to a date and time to be set by this court; however, no earlier than sixty (60) days.

This Stipulation is being entered into for the following reasons:

1. The United States will provide early discovery upon entry of a protective order, and the continuance is needed to allow the defendant time to review the evidence in anticipation of a pre-indictment resolution of the case.

1 2. The defendant is incarcerated, and does not object to the continuance.

2 3. The additional time requested herein is not sought for purposes of delay, but merely
3 to allow counsel for the government and the defendant sufficient time to attempt to resolve this
4 matter.

5 4. Denial of this request for continuance would deny counsel for the defendant
6 sufficient time to effectively and thoroughly complete negotiations, taking into account the
7 exercise of due diligence.

8 5. Additionally, denial of this request for continuance could result in a miscarriage of
9 justice.

10 6. The additional time requested by this Stipulation is excludable in computing the
11 time within which the trial herein must commence pursuant to the Speedy Trial Act, Title 18,
12 United States Code, Section 3161(h)(1)(D) and Title 18, United States Code, Section
13 3161(h)(7)(A), considering the factors under Title 18, United States Code, Section
14 3161(h)(7)(B)(i) and 3161(h)(7)(B)(iv).

15 7. This is the first request for a continuance of the preliminary hearing.

16 DATED: this 27th day of April, 2015.

17 DANIEL G. BOGDEN
18 United States Attorney

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20 /s/ Sarah E. Griswold
SARAH E. GRISWOLD
Assistant United States Attorney

21 /s/ Raquel Lazo
RAQUEL LAZO
Counsel for Defendant John Doe,
a.k.a. Arnold Malone

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UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

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UNITED STATES OF AMERICA,)	Case No.: 2:13-mj-652-VCF
)	
Plaintiff,)	ORDER TO CONTINUE PRELIMINARY
)	HEARING
vs.)	
)	
JOHN DOE, a.k.a. Arnold Malone,)	
)	
Defendant.)	

FINDINGS OF FACT

Based on the pleadings and arguments of counsel, and good cause appearing therefore, the Court finds that:

1. The United States will provide early discovery upon entry of a protective order, and the continuance is needed to allow the defendant time to review the evidence in anticipation of a pre-indictment resolution of the case.

2. The defendant is incarcerated, and does not object to the continuance.

3. The additional time requested herein is not sought for purposes of delay, but merely to allow counsel for the government and the defendant sufficient time to attempt to resolve this matter.

4. Denial of this request for continuance would deny counsel for the defendant sufficient time to effectively and thoroughly complete negotiations, taking into account the exercise of due diligence.

